

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LEONARD LICHT,

Plaintiff,

v.

BINANCE HOLDINGS LIMITED, d/b/a
BINANCE.COM, BAM TRADING
SERVICES, INC., d/b/a BINANCE.US, and
CHANGPENG ZHAO,

Defendants.

No. 1:24-cv-10447-NMG

**JOINT MOTION FOR ENTRY OF
STIPULATION EXTENDING TIME TO RESPOND TO COMPLAINT**

Plaintiff Leonard Licht (“Plaintiff”) and Defendants Binance Holdings Limited (“BHL”) and Changpeng Zhao (“Mr. Zhao”) (Plaintiff, BHL, and Mr. Zhao are collectively referred to as the “Parties”) jointly move the Court to enter the stipulation attached as **Exhibit 1** (“Stipulation”) extending the deadline for BHL and Mr. Zhao to respond to the Complaint to June 6, 2024.

In support of this motion, the Parties state as follows:

1. On February 23, 2024, Plaintiff filed the Complaint in this case. *See* Dkt. No. 1.
2. BHL and Mr. Zhao are named as defendants.
3. On March 5, 2024, the Parties’ counsel conferred regarding service of the Complaint. BHL and Mr. Zhao agreed to waive service and in exchange Plaintiff agreed to a 90-day period from the date the Notice of a Lawsuit and Request to Waive Service of a Summons (“Waiver Request”) and the Waiver of Service of Summons (“Waiver”) is sent to BHL and Mr. Zhao to respond to the Complaint.

4. The Parties entered the Stipulation attached hereto as **Exhibit 1** memorializing the agreement.

5. On March 8, 2024, Plaintiff's counsel emailed the Waiver Request and the Waiver for BHL and Mr. Zhao to their counsel.

6. On March 8, 2024, counsel for BHL and Mr. Zhao returned the signed Waivers to Plaintiff's counsel.

7. A 90-day period to respond to the Complaint—starting on March 8, 2024, the date when Plaintiff's counsel sent the Waiver Request and the Waiver—sets BHL's and Mr. Zhao's response deadline as June 6, 2024.

8. A 90-day response period is reasonable given the factual and legal complexities of this case, and it will allow BHL and Mr. Zhao to properly analyze the allegations and fully respond.

9. Neither party will be prejudiced by the extension.

10. As a result, the Parties request that the Court enter the Stipulation and grant BHL and Mr. Zhao until June 6, 2024 to respond to the Complaint.

11. No other extension of time has been requested in this case.

WHEREFORE, the Parties jointly move for the Court to enter the Stipulation at **Exhibit 1** extending the time for BHL and Mr. Zhao to respond to the Complaint to June 6, 2024.

Dated: March 11, 2024

/s/ Aaron M. Katz

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